

REMARKS

Claims 1 to 21 are in the application of which claims 14 to 20 are indicated as being allowable over the prior art. We assume that the Examiner meant to include claim 21 also since it is dependent on claim 14.

Claim 13 as been amended to address the objections noted in paragraphs 5 and 6 of the action.

Allowable claim 14 has been amended to place it in independent form. Therefore claim 14 and claims 15 to 21 dependent thereon should be allowed.

We request reconsideration of the rejection of claims 1, 2, 6 to 10, 12 and 13 as being anticipated by Rosler '318.

Independent claim 1 specifies that the module base of applicant's holder assembly includes a plurality of first tubes. According to Webster's 7th New Intercollegiate Dictionary, the principle meaning of "tube" is--a hollow elongated cylinder--. That is, a tube has a wall with inner and outer surfaces and that is the meaning to be accorded that word in claim 1. To emphasis this, we have amended claim 1 to specify that the tubes therein have corresponding outer surfaces and corresponding inner surfaces which define first passages. Also, the claim has been further amended to specify a first web connecting the outer surfaces of the tubes to support the first tubes in parallel spaced-apart relation so that a fluid can circulate around and between the first tubes.

Thus, the holder assembly recited in claim 1 is distinctly and patentably different than the device disclosed in Rosler. The elements 6 in Rosler are not tubes within the meaning of applicant's claims. They are simply boreholes as stated at Pat. Col. 2, line 62 and depicted in Pat. Figs. 1 and 2. Each borehole 6 does not have a wall with both outer and inner surfaces. Rather, the bore holes 6 are drilled or otherwise formed in a solid body or block 3 so that fluid cannot possibly circulate between the boreholes 6 in that device. In other words, since the elements 5a, 5b, 8 and 10 in Rosler, referred to by the Examiner, are simply different surfaces of the same solid block, those elements cannot possibly constitute a first web that connects outer surfaces of tube walls and supports tubes in parallel spaced apart relation so that fluid can circulate around and between the first tubes as asserted by the Examiner in paragraph 3 of the invention.

Accordingly, claim 1 is neither anticipated by nor obvious from Rosler and should be allowed. Claim 2, 6 to 10, 12 and 13 being dependent upon claim 1 should be allowed for the same reasons.

Claim 8 is allowable also over that reference also because there is nothing in Rosler that remotely suggests the plurality of keys recited in that claim.

Claims 12 and 13 are allowable also in that there is no suggestion in Rosler of the bridges or bottom walls spaced below the lower ends of the first passages as recited in those claims. In Rosler, the tool supports are simply the bottoms of the boreholes 6. Each such bearing surface 4 is obviously not a bridge and being a bottom wall of a borehole, it obviously cannot possibly be spaced below the lower end of that borehole 6.

We also request reconsideration of the rejection of claims 1, 3 to 5, 10 and 11 as being anticipated by Denton et al. '917. This reference is no better than Rosler in teaching applicant's claimed invention as recited in claim 1.

More particularly, claim 1 specifies that the first tubes in applicant's assembly define first passages having open lower ends so that a fluid can circulate through those passages. It is quite obvious from Denton et al.'s Fig. 6 that the lower ends of cavities 16 in his device are all closed. Therefore, that reference cannot possibly anticipate applicant's claim 1.

Claims 3 to 5 are allowable also in specifying a cover having specific characteristics. Denton et al.'s Fig. 4 shows a device embodiment with a cover. However, that cover is not composed of spaced apart tubes as defined in applicant's claims 3 to 5.

Accordingly, for the foregoing reason, claims 1 to 13 are neither anticipated by nor obvious from the references of record. Therefore they should be allowed.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,



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